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COURT OF APPEALS
DIVISION II

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STATE OF WASHINGTON

TAB

Court of Appeals No. 54432-6-II

BEFORE THE WASHINGTON STATE COURT OF APPEALS
DIVISION TWO

PAULA STEVEN

Appellant

vs.

DENNIS SCHROADER, JR. and JANE DOE
SCHROADER, husband and wife; and SCHROADER LAW,
PLLC, a WASHINGTON professional limited liability company
doing business as the LAW OFFICE OF DENNIS
SCHROADER

Respondent

On Appeal from the Pierce County Superior Court
Case No. 19-2-09486-4

REPLY BRIEF

PAULA STEVEN, PRO SE
P.O. Box 4071
Federal Way, Washington 98063

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I. INTRODUCTION

The bulk of Respondent Dennis Schroader's argument is that their version of the facts is to be believed alone, and that this Court (and the lower court) should weigh the evidence and try the case on documents. The Court is aware, the standard of Motion for Summary Judgment is the total opposite. The Court is to review the evidence in the **light most favorable** to the non-moving party, and to **not** judge credibility nor weigh evidentiary inferences

Appellant Paula Steven respectfully submit that the lower court erred by (1) applying the doctrine of collateral estoppel; by ignoring the evidentiary inferences favorable to Appellant; ignoring issues of genuine issues of fact as to causation and damages.

II. ARGUMENT

A. **Respondent's acknowledge Appellant is not Barred by Issues of Preclusion and was Legally Tenable, Appellant showed she would have obtained a better result but not for Respondent's defective advice, Genuine, Material Issues of Fact Exist as to whether Respondent's Actions were the Proximate Cause of Appellant's Damages**

In Respondent's Reply pleadings they assert themselves and acknowledge the error that Appellant was not barred by Issue of Preclusion. Respondent's know the assertion of Collateral Estoppel is simply illogical and an error. Appellant not only raised triable issue of fact as to causation. Appellant did such with legal certainty.

Respondent's **not any** where in their Reply disputes that Respondent

Dennis Schroader, advised Appellant Steven *"that the purpose of the CR2A agreement was to avoid the, King County Sheriff, from evicting her from her residence within a few days. Schroader, told Steven, that she could still pursue her claim against FREO Washington, LLC for retaliation."* That is negligent advice.

Respondent's has failed to show evidence that Appellant's evidence in this action is without merit. Appellant has established her (case within a case) would have survived summary judgment. Appellant is very confident that after a hearing on the merits, that the court would have recognized her defense of retaliation by the landlord and would have dismissed the unlawful detainer action against her.

This is a little bit of the timeline, October 31, 2014, Appellant was awarded Judgment against FREO Washington, LLC, in the amount of \$2,057.50, (*Paula Steven v. FREO Washington, LLC, Cause No. 14-2-24308-1 SEA*) for violation of RCW 59.18.¹ December 2014, FREO Washington LLC received Appellants housing complaint, filed King County Office of Civil Right's and Open Government, and Housing and Urban Development.²

January 29, 2015, her landlord FREO Washington, LLC raised Appellant's rent. Rent was raised after FREO Washington, LLC received the Housing Complaint.

January 2015 through December 2015 FREO Washington's continued

1 CP 782 - 1330 (Exhibit 12 to the Steven Declaration).
2 CP 782 - 1330 (Exhibit 10 to the Steven Declaration).

refusal to cooperate in the investigation of the King County Office of Civil Right's and Open Government, and HUD Housing Complaint Appellant issued against them a Subpoena from King County Office of Civil Right's and Open Government.³

January 26, 2015 through August 2016 Appellant notified FREO Washington, LLC approximately 28 (twenty-eight) time of repairs and defects to the property.⁴ Appellant filed and won 3 (three) judgments from King County Superior Court on July 12, 2016, March 11, 2016, and October 31, 2014, for violation RCW 59.18.060 and diminished rental value.⁵

Specifically, as stated above the King County Office of Civil Right's and Open Government, from November 2014, through December 2015, had continually attempted to get FREO Washington, LLC's voluntary cooperation in the investigation of the Housing Complaint filed by Appellant Steven. Due to their continued non-cooperation with the investigation in December 2015, FREO Washington LLC received a Supeona from the King County Office of Civil Right's and Open Government. FREO Washington. Additionally FREO also received violations of Code Enforcement from the King County Department of Permitting and Evironmental Review, for the defective roof.⁶

August 28, 2015, Appellant notified FREO Washington, LLC, alleging they were continually violating her rights as a tenant and subjecting her to

3 CP 782 - 1330 (Exhibit 20 to the Steven Declaration).
4 CP 782 - 1330 (Exhibit 13 through Exhibit 67 to the Steven Declaration).
5 CP 782 - 1330 (Exhibit 63, 37, 12 to the Steven Declaration).
6 CP 782 - 1330 (Exhibit 15 and 59 to the Steven Declaration).

discrimination and retaliation.⁷ September 23, 2015, Appellant notified FREO Washington, LLC alleging violation of her tenant rights, diminished rental value and retaliatory actions against her.⁸ November 23, 2015, Appellant notified FREO Washington LLC, of alleged violation of RCW 59.18.060.⁹ November 30, 2015, Appellant notified FREO Washington LLC, of maintenance issues, roof defects and her concerns they were intentionally retaliating against her and violating her tenant rights.¹⁰

As stated above December 2015, Freo Washington LLC was issued a Supeona from the governmental agency. The fact that FREO Washington's, LLC notified Appellant she would need to move after all of these acts is evidence of retaliation. Additionally it is evidence that Appellant would have survived summary judgment, there were disputable facts.

Appellant alleged FREO Washington LLC motives were improper when they notified her she would have to move in December 2015 and January 2016. The accounts of these motives are contested. That alone suffices to defeat FREO Washington LLC Summary Judgment Motion.

As stated in Appellant's Opening Brief, June 17, 2016, the King County Office of Civil Right's and Open Government issued their "No Reasonable Cause Findings," stating in their Findings and Determination the following below:

"With regard to rent payment issues, the evidence indicates

7	CP	782 - 1330 (Exhibit 17 to the Steven Declaration).
8	CP	782 - 1330 (Exhibit 17 to the Steven Declaration).
9	CP	782 - 1330 (Exhibit 18 to the Steven Declaration).
10	CP	782 - 1330 (Exhibit 18 to the Steven Declaration).

that onsite Respondent rental management had poor organization that resulted in error-ridden billing practices. However, the evidence does not indicate that race was a factor in their financial management."

*"With regard to the repair issues, Charging Party's experience with Respondent's process is replete with excessive delays, miscommunications and partial repairs. The similiary situated residents who are Caucasian lived in a rental house that had equally serious repairs needs. They were subjected to remarkably similar poor maintenance and repair actions on the part of Respondents."*¹¹

July 2016, the Public Health-Seattle and King County Environmental Health notified FREO Washington LLC the septic tank holes in the yard needed to be capped to mitigate hazards in the backyard.¹²

May 5, 2020, Appellant filed a Notice of Small Claim action against FREO Washington, LLC for violation of RCW 59.28.060.¹³ On July 12, 2016, Appellant was granted a Judgment from the honorably Arthur Chapman, Judge.¹⁴

Appellant paid her June and July 2016 rent in full and on time. FREO Washington LLC, returned her rental payments. On July 6th and July 7, 2016, Appellant notified FREO she put the returned rental payment in an escrow account until they wanted them.¹⁵

August 1, 2016, FREO filed an Eviction Summons, Order to Show Cause, and Complaint for Unlawful Detainer against Appellant, for a false cause of

11	CP	782 - 1330 (Exhibit 57 to the Steven Declaration).
12	CP	782 - 1330 (Exhibit 59 to the Steven Declaration).
10	CP	782 - 1330 (Exhibit 50 to the Steven Declaration).
14	CP	782 - 1330 (Exhibit 63 to the Steven Declaration).
15	CP	782 - 1330 (Exhibit 61 to the Steven Declaration).

action and misrepresentation alleging in the Unlawful Detainer action Appellant owed rent to FREO in the amount of \$3,106.00 for the months of June and July 2016.¹⁶

Per RCW 59.18.250:

Reprisals or retaliatory actions by landlord---Presumptions---Rebuttals---Costs.

"Initiation by the landlord of any action listed in RCW 59.18.240 within ninety days after a good faith and lawful act by the tenant as enumerated in RCW 59.18.240, or within ninety days after any inspection or proceeding of a governmental agency resulting from such act shall create a rebuttable presumption affecting the burden of proof, that the action is a reprisal or retaliatory action against the tenant."

RCW 59.18.240, prohibits reprisals or retaliatory actions by landlord---Prohibited:

So long as the tenant is in compliance with this chapter, the landlord shall not take or threaten to take reprisals or retaliatory action against the tenant because of any good faith and lawful:

(1) Complaints or reports by the tenant to a governmental authority concerning the failure of the landlord to substantially comply with any code, statute, ordinance, or regulation governing the maintenance or operation of the premises, if such condition may endanger or impair the health or safety of the tenant; or
(2) Assertions or enforcement by the tenant of his or her rights and remedies under this chapter.

"Reprisal or retaliatory action" shall mean and include by not be limited to any of the following actions by the landlord when such actions are intended primarily to retaliate against a tenant because of the tenant's good faith and lawful act:

- (a) Eviction of the tenant;
- (b) Increasing the rent required of the tenant;
- (c) Reduction of services to the tenant; and

16 CP 1680 - 2020 (Exhibit 115 to the Steven Declaration).

(d) Increasing the obligations of the tenant.
Initiation by the landlord of any action listed in RCW **59.18.240** within ninety days after a good faith and lawful act by the tenant as enumerated in RCW **59.18.240**, or within ninety days after any inspection or proceeding of a governmental agency resulting from such act shall create a rebuttable presumption affecting the burden of proof, that the action is a reprisal or retaliatory action against the tenant.

Additionally FREO Washington LLC, did not post a for sale sign. FREO did not sell the house until January 2017. FREO in their letter dated December 9, 2015 to Appellant via their property management company state, "*The owner in your home is considering selling your home.*" There is evidence that the King County Office of Civil Right's and Open Government for over a year November 2014, through December 2015, attempted to obtain without a subpoena, all information necessary to investigate the "***P. Steven et al FREO WA and Brink Property Management ,et al KCH 12-14-04, HUD 10-15-0099-8,***" case Appellate filed against FREO Washington, LLC. After these action were taken FREO told Appellate she needed to move.

There is evidence that after the King County Office of Civil Right's and Open Government issued their Finding and Determination, Appellant won her 3rd (third) judgment from King County Superior Court, for FREO's 3rd (third) violation of RCW 59.28.060, and the King County FREO Washington, and the King County Department of Permitting and Evironmental Review, notifying FREO to repair septic tank holes in yard, FREO Washington LLC, started an eviction lawsuit against Appellant Steven.

The Respondent's failed to *provide evidentiary support* for their motion for summary judgment that goes beyond their mere allegations. Respondent's have

showed no evidence that Appellant cannot prove her case. *Celotex*.

Respondent's, have failed to offer affirmative evidence or show that Appellant's, evidence is insufficient to establish essential element of her claims. Per *Celotex*.

Respondent's presented no evidence that Appellant's underlying action was without merit. Literally, not one piece. Respondent's do not even provide nor direct this Court to any evidence in their Reply to the Appellant's Opening Brief, briefing, court papers, nor otherwise. Appellant has no legal background and Respondent's and their counsel do, saying that to say, the reason they presented no evidence is because they do not hold any.

Respondent's cite *Slack v. Luke* 192 Wn.App. at 919, 307 P.3d 55 (2016). The Appellant, in this case, Tammy Slack, did not have an attorney expert to testify that her underlying claim had some merit. The court granted summary judgment to the defendant's.

Appellant Steven retained her legal malpractice expert unlike Tammy Slack in *Slack v. Luke* 192 Wn.App. at 919, 307 P.3d 55 (2016)¹⁷ Respondent's Dennis Schroader, would not cooperate in the discovery process. Appellant had to file a Motion to Compel.¹⁸

Appellant's Motion to Compel was filed because Respondent's refused to answer and produce discovery requests. Respondent's responses to Appellant's propounded First and Second Set of Requests for Interrogatories, Production and Requests for Admissions were deficient as Appellant put forth in her Motion to Compel. Appellant also alleged they would not participate in the

17 CP 1680 - 2020 (Exhibit 133 to the Steven Declaration).
18 CP 324 - 781 and 1331 - 1348.

CR 26 mandatory discovery conference.

Moreover, what is peculiar is why is my then counsel the Respondent Dennis Schroader, have FREO Washington's, attorney Mr. Dean von Kallenbach, who represented FREO in the Unlawful Detainer, as a witness in the Legal Malpractice action Appellant Steven has bought against Respondent. Mr. Kallenbach, has provided a Declaration in Support of Mr. Schroader's Motion for Summary Judgment.¹⁹ To be clear, Mr. Dean von Kallenbach, was the FREO Washington LLC's attorney in the (*FREO Washington, LLC. v. Paula Steven, Case No. 16-218347-6 KNT* (the FREO Washington, LLC matter))

November 15, 2019 Appellant Steven issued a Subpoena Duce Tecum to Respondent Schroader's witness in the Legal Malpractice lawsuit Williams, Kastner & Gibbs, PLLC, who is as Appellant mentioned above FREO Washington, LLC's counsel in the Unlawful Detainer action taken against Appellant Steven.²⁰

It is more peculiar that in Appellant's Motion to Compel she alleges they (Respondent Schroader and Mr. Dean von Kallenbach,) are both hiding the same documents and electronic mail.²¹

B. The Gravamen nor Appellant Is Barred by Issue Preclusion

The fact is Appellant did not litigate her legal malpractice claims nor the CR 2A Agreement. This fact is shown in Appellant's Opening Brief.

19	CP	190 - 197
20	CP	255 - 256.
21	CP	324 - 781 and 1331 - 1348.

Respondent's themselves produced no evidence that the CR 2A Agreement was adjudicated.

As Appellant Steven stated in her Opening Brief she notified Pierce County District Court, Small Claims, via her Counter Claim, oral testimony, and correspondence to Schroader stating the following:

"I am not bringing/litigating nor can I because of my damages in my legal malpractice claims/lawsuit.

Therefore, the **doctrine of Res Judicata** should not apply. My claims for legal malpractice are valid and have been confirmed with a legal malpractice attorney. My claims cannot be brought in this court. Please, let the record show that **I am not waiving my legal malpractice claim. My claim is barred from this jurisdiction.**" ²²

Judge Lindstrom's court was not the correct jurisdiction for a legal malpractice action. Not sure why Respondent's insist on wasting the Court's valuable time on that.

In Appellant's Opening Brief, she argued in order for the doctrine of collateral estoppel to apply, four requirements must be met: 1) the issue decided in the prior adjudication must be identical with the one presented in the second; 2) the prior adjudication must have ended in a final judgment on the merits; 3) the party against whom the plea is asserted was a party or privity with a party to the prior adjudication; and 4) application of the doctrine must not work an injustice. *Barr v. Day*, 124 Wn.2d 318, 325 (1994). Each requirement must be met in order for collateral estoppel to apply and the burden of proof is on the party seeking estoppel. *George v. Farmers Ins. Co. of Washington*, 106 Wn.App. 430,

22 CP 1680 - 2020 (Exhibit 101 to the Steven Declaration).

433 (2001); *McDaniels v. Carlson*, 108 Wn.2d 299, 303, (1987).

In the *FREO Washington, LLC* and the *Schroader* matters, Court Commissioner Bradburn-Johnson, nor Judge Lindstrom never ruled on Appellant's claims of legal malpractice or the elements of causation and/or damages, and Appellant is not **collaterally estopped**.

Collateral Estoppel should not apply, no where in Commissioner Bradburn-Johnson, nor Judge Lindstrom do they make an adjudication as to whether Respondent Schroader were liable for providing faulty advice to his client, Appellant Steven.

To the opposite, Commissioner Bradburn-Johnson and Judge Lindstrom did not rule, unambiguously in the *FREO Washington LLC's*, and *Schroader* findings that the attorney's advice was not a cause in fact to the signing of the CR 2A Agreement. The honorable Court Commissioner Nancy Bradburn-Johnson, stated on the record Respondent Schroader is not a party in the Unlawful Detainer action and she will not hear testimony nor rule on the, Motion to Revoke August 16, 2016, CR2A Agreement. She stated that the allegations made in the Motion to Revoke August 16, 2016, CR2A Agreement, Declaration of Paula Steven in Support of of Motion to Revoke CR2A Agreement Executed on August 16, 2016, is an issue between "*Steven and Schroader*," not an issue between, "*FREO Washington, LLC, and Steven*." The honorable Nancy Bradburn-Johnson, did not allow CR 2A, issues nor claims of the CR2A, to be litigated.²³

23 CP 1680 - 2020 (Exhibit 117 to the Steven Declaration).

Collateral Estoppel and Res Judicata, it must be shown that the **"issue"** was **"actually litigated"** in the prior action and that such issue was necessary to the outcome of such action. *Luisi Truck Lines, Inc. v. Washington Utilities and Trans. Comm.* (1967) 72 Wn.2d 887, 893-895; *State Farm Mut. Auto. Ins. Co. v. Avery*, 114 Wn.App.299, 304 (2002). Appellant Steven could not have litigated any issue regarding Respondent's professional liability during the course of the FREO Washington, LLC and Schroader matters, even if she had wanted to. The FREO matter Respondant Schroader was not a party to the underlying action, nor was his conduct at issue and in the Schroader matter, Small Claims court is not the correct jurisdiction, his conduct was not at issue, and Appellant notified the Small Claims court and Respondent Schroader the following below.

"Please, let the record
show that I am not waiving my legal malpractice claim.
My claim is barred from this jurisdiction".

Finally, as noted in the Opening Brief, it must also be shown that the issue previously adjudicated were material and necessary to the outcome of the prior action, and that the application of collateral estoppel will not work an injustice on the party. *Luisi*, 72 Wn.2d at 893-894; *J.A. Henderson v. Bardahl International Corp.*, 72 Wn.2d 109, 118 (1967) ("It is axiomatic that for collateral estoppel by judgment to be applicable, that the facts or issues claimed to be conclusive on the parties in the action were actually and necessarily litigated. . . (emphasis added)).

Did Judge Arend actually set forth her analysis of the elements of collateral estoppel, and why applying the doctrine would **not** work an injustice on

Appellant Steven. In fact, her ruling did work such an injustice as Appellant Steven concedes Respondent Schroader gave her wrong, faulty advice, and that such was a breach of the standard of care.

C. Steven did not Fail to Demonstrate Breach of Duty by Respondent's Schroader

On page 35 of Appellant's Opening Brief she states the following below

"but for" question that asks whether one event (e.g., kicking a ball down a hill) caused a subsequent event or events (e.g., breaking through a glass car window). Legal causation rests on policy considerations of how far the consequences of the negligent act should extend and whether liability should attach, as a matter of law (say if an earthquake seconds later leveled the whole house). *City of Seattle v. Blume*, 134 Wn.2d 243, 251-52 (1997)."

Page 36 of Opening Brief:

"The courts stated in the *Brust* and *Versus-Law*, supra, the "second trier of fact will be asked to decide what a reasonable jury or fact finder would have done but for the attorney's negligence" unless "reasonable minds could reach but one conclusion." Here there is one simple question: What was the cause "in fact" of the CR2A Agreement? And, therefore, can a reasonable mind *only* conclude that the conduct of Steven--after she signed the CR2A--were the sole cause in fact of their damages."

"It is a "given" that Schroader provided Steven, negligent advice. The evidence is abundantly clear that the one, and only act, that set everything in motion was the negligent advice given by Schroader, to Steven. There is no dispute that **prior** to seeking out legal advice of Schroader, Steven, believed she was being retaliated against."

Page 38 of Opening Brief:

"It is unambiguous that signing of the CR2A, itself, that act set in motion by Schroader, telling Steven "*that is was okay*" to do so. That act is the proverbial kicking the ball down the hill; the fact that

the ball may have taken course of twists and turns is not material. All damage in its wake is directly attributable to the one act, to wit: The giving of improper, incorrect and erroneous legal advice by Schroader. There was no reversing that act, just as there was not reversing the signing of the CR2A Agreement.”

“Once that act occurred (*i.e. the signing of the CR2A*)—the retaliation was lost. All subsequent acts and decisions, do not change the fact that the proximate cause-in fact of Steven’s, loss was the undisputed “*incorrect advice*” given by Schroader.”

On page (i) of Appellant’s Opening Brief she assigned error to negligence and breach of duty in “(B) Issues Pertaining to Assignment’s of Error”.

Appellant alleges Respondent’s seem purposely confused attempting to to make a mockery out of Appellant’s well brought Opening Brief, the court and the law.

However, I would like to put light on the fact Respondent’s did not willingly and knowingly dispute Appellant’s allegations that Respondent in fact breached his duties owed to her and was negligent. Additionally the record should show they in fact by their own briefing waived their right to argue Appellant’s allegations that Respondent breached his duties and is negligent as Appellant put forth in her Opening Brief and to the lower court.

Appellant did not fail to demonstrate any breach of duty by Respondent Schroader. Respondent’s hold no evidence that Respondent Schroader did not breach his duty Appellant and was not negligent. So they have chose to waive their rights of disputing and proving.

This goes along with Respondent’s “Sixth Affirmative Defense (**Bona Fide Error**)” in their “Answer to Complaint for Damages,” that was ultimately

stricken on November 1, 2019, by the honorable Judge Shelly K. Spier in her Order Granting & Denying Motion to Strike Defendant's Affirmative Defenses. ²⁴

It is evidenced in Appellant's Opening Brief she retained an expert witness to provide independent expert/technical analysis and opinion on her issues. ²⁵

Respondent's cite *Geer v. Tonnon*, 137 Wn. App. 838, 851 (2007). This case does not apply to Appellant Steven. Steven obtained an expert witness. As referenced in Appellant's Opening Brief. In Appellant's November 22, 2019, Motion to Extend Time to Respond to Defendants Motion for Summary Judgment and the oral testimony she gave at the court hearing she notified the honorable Judge Shelly K. Speir, that although she, Appellant, had requested an extension through February 3, 2020, for her response to Respondent's Motion for Summary Judgment that she did not believe that would be adequate time for her expert witness to prepare his declaration. ²⁶ Appellant briefed in her Motion significant time is needed to prepare expert declarations, Appellant's declarations, and additional evidence in opposition. Appellant ask the Court to extend time beyond February 3, 2020, to provide her expert witness time to prepare his declaration so therefore Appellant could provide the Court with the most complete and accurate factual record possible for its resolution of Appellant's vital claims. The Court would not extend beyond February 3, 2020.

Additionally, Appellant had to file a Motion to Compel because

24	CP	37 - 39.
25	CP	1680 - 2020 (Exhibit 133 to the Steven Declaration).
26	CP	268 - 311 (Page 4).

Respondent's Schroader was intentionally not participating in discovery and withholding documents from Appellant. Appellant needed to provide her expert witness with Responses from her discovery she propounded to Respondent Schroader.

"Expert testimony is often required to determine whether an attorney's duty of care was breached in a legal professional negligence action ,because the "[l]aw is admittedly a highly technical field beyond knowledge of the ordinary person." *Lynch v. Republic Publ'g Co.* 40 Wn.2d 379, 389, 243 P.2d 636 (1952).

D. The Consumer Protection Action Does Not Fail for Lack of Public-Interest Element nor any Other Element

Appellant not only demonstrated a claim that meets the definition of a CPA claim, she did so as a matter of law and she did so by meeting all elements. As briefed in Appellant's Opening Brief, a claim under the Washington Consumer Protection Act, ("CPA") requires (1) an unfair or deceptive act or practice; (2) occurring in trade or commerce; (3) that impacts the public interests; (4) injury to business or property; and (5) causation. *Hangman Ridge Training Stables, Inc. v. Safeco Title Ins.*, 105 Wn.2d 778, 780, 719 P.2d 531 (1986).

Appellant alleges that Respondent Schroader, and his legal team have demonstrated intentional disrespect for the Court and Law in their Response to Appellant's Opening Brief. As though the Court does not have a case load of cases to filter through.

Appellant in page 41 (fourty-one) paragraph 3 (three) of her Opening Brief

states "*Schroader, billed Steven, for Ms. Wood, on August 9, 2016.*" Additionally, Appellant provided the footnoote that showed the invoice of his billing.²⁷

Appellant alleges Respondent Schroader decieved the Appellant and public with intent.

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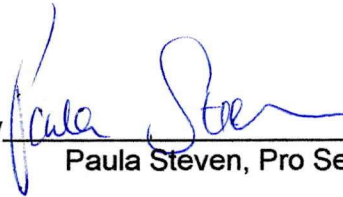
27 CP 782 - 1330 (Exhibit 86, page 3, to the Steven Declaration).

III. CONCLUSION

For all the foregoing reasons, Appellant respectfully submit that this Court reverse the order of Summary Judgment and remand this matter to the Pierce County Superior Court or for reasons and concerns stated in Appellant's Opening Brief the King County Superior Court.

Dated: November 1, 2020

By

A handwritten signature in blue ink, appearing to read "Paula Steven", is written over a horizontal line.

Paula Steven, Pro Se

FILED
COURT OF APPEALS
DIVISION II
2020 NOV -4 PM 5:00 AF
STATE OF WASHINGTON

DECLARATION OF SERVICE

I, John Green, hereby declare and state as follows:

I am a citizen of the United States and a resident of Federal Way, Washington; I

am over the age of eighteen years and not a party to the within action.

On the date set forth below, I caused to be served:

*** APPELLANT'S REPLY BRIEF**

in the within matter by arranging for a copy to be delivered on the interested parties in the said action, in the manner described below, addressed as follows:

Counsel for the Defendants'

Gregor A. Hensrude, Attorney
Alex Foster-Brown
Erin Thenell, Attorney
Klinedinst PC
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ghensrude@klinedinstlaw.com
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✓

VIA U.S. MAIL
HAND DELIVERY

I declare under penalty of perjury that the foregoing is true and correct, and that this declaration was executed on November 4 , 2020 at Federal Way, Washington.



John Green